

Site Name: Olin/S. P. Oliver Site, Wallisville Road, Houston



Potential Responsible Parties:

Olin Corporation
275 South Winchester Ave.
New Haven, CT 06511

Eureka Investment Corporation
c/o Mustang Industrial
Equipment Co.
7621 Wallisville Road
Houston, Tx. 77002

Southern Pacific Transportation Co.
Room 826
1 Market Place
San Francisco, CA 94105

Houston Belt & Terminal
Railway Company
501 Crawford Street
Houston, Tx. 77002

Contacts for Parties:

Olin Corporation: Allyn Carnam
Olin Corporation
P.O. Box 30-275
New Haven, CT 06511
203/789-5330

OLIN CORP-S P OLIVER
720000602028
Eureka Investment: Fred Stumpf
Oliver, Stumpf et. al
1400 Post Oak Blvd.
Houston, Tx. 77056
713/871-0919

Southern Pacific:
Carol Gallagher
Crain, Craton et.al
3300 Two Houston Center
Houston, Tx.
713/658-2323

Houston Belt & Terminal:
Louis Zimmerman
Fulbright & Jaworski
1150 Connecticut Ave., N.W.
Washington, D.C. 20036
202/452-6848

Description of Type of Waste Management Activity of Concern:

The subject site was occupied by a pesticide formulating plant owned by Olin Corporation from 1950 to 1973. In 1973, the property was sold to Eureka Investment Corporation. In 1977, Eureka sold the eastern portion of the property to Southern Pacific Transportation Company. Houston Belt & Terminal owns a right-of-way just east of the property. A map of the site is attached to this report.

In 1980, the site came to the attention of the EPA as the result of the Eckhardt Survey of potential hazardous waste sites. EPA-sponsored investigations have identified considerable pesticide contamination of the surficial soils at the site and drainage ditches adjacent to the northern and eastern boundaries of the site. The primary pesticides involved are DDT, toxaphene, lindane and pentachloronitrobenzene. The EPA has also identified potential waste disposal areas at the site; however deep borings have not been completed for verification.

The soils at the site are presently covered with concrete, asphalt or crushed limestone and are enclosed by a hurricane fence, thereby apparently posing no immediate threat to the public or the environment. The ditches, however, are not covered and are easily accessible to residents in a neighborhood located just north of the site. These ditches present a pathway for contamination from the site to impact surface water and also present a threat of direct pesticide exposure to residents of the neighborhood, especially children.

Summary of Noncompliance

The pesticide contamination at the site and bordering ditches poses a potential threat to the public and the surface and ground water which is a violation of 31 TAC Section 335.4 and Chapter 26 of the Texas Water Code. The potential responsible parties (PRPs) for the site are Eureka and Southern Pacific as property owners and Olin Corporation as owner/operator of the former pesticide plant. Houston Belt and Terminal owns the contaminated ditch east of the site. Eureka and Southern Pacific have filed suit in federal court against Olin wherein they seek rescission of the land sales contracts from Olin.

Dates of Notice of Violation Letters

1. February 20, 1985 (Executive Director letter)
2. May 28, 1985 (Compliance Agreement - Not executed by PRP's)
3. July 17, 1985 (Executive Director letter)

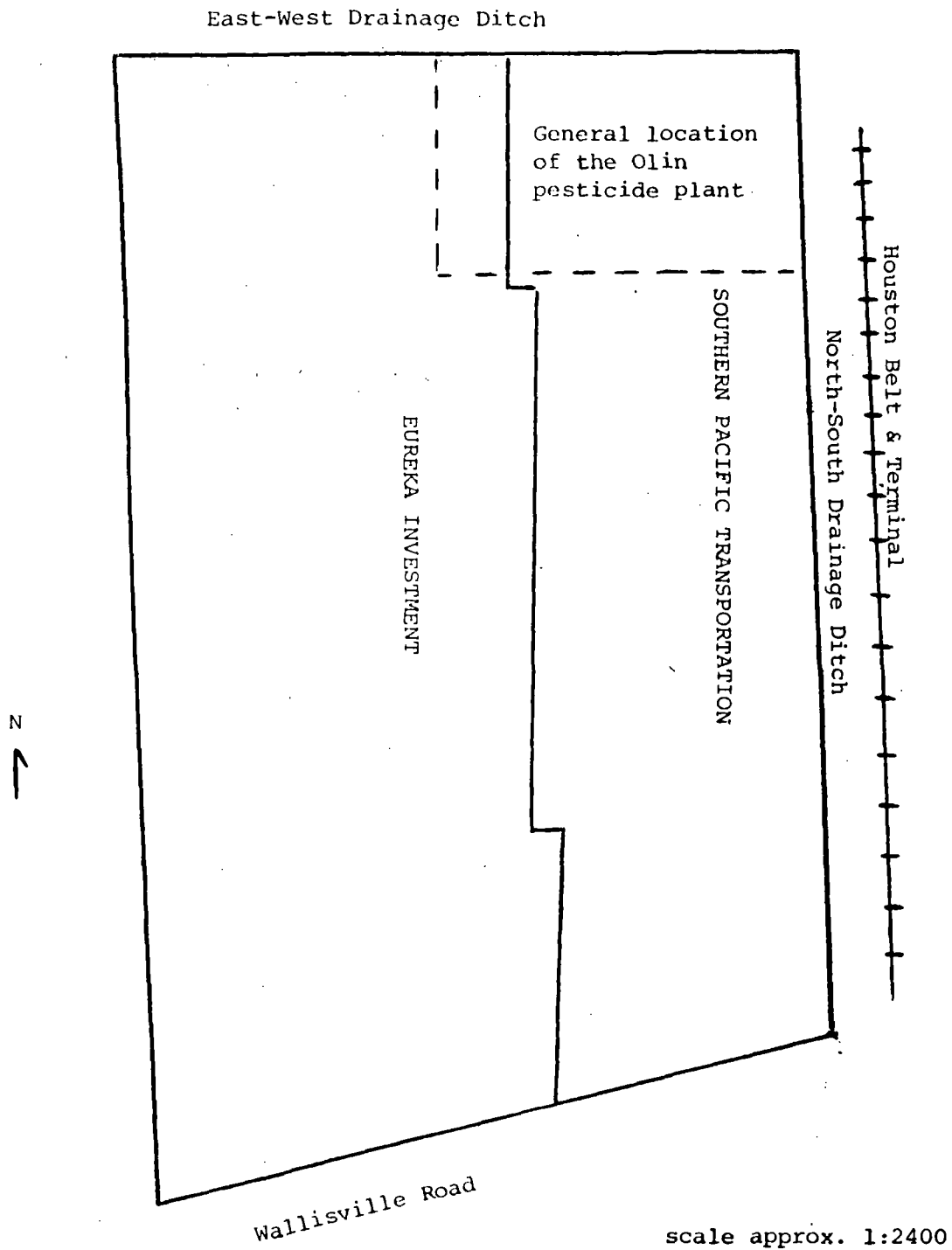
Discussion

The enforcement responsibility against the PRPs was handled by EPA Region VI as a non-priority Superfund site from 1980 to June, 1984, when EPA transferred the enforcement lead to the TWC (then the TDWR). On November 14, 1984 an initial meeting was held between the TWC and the PRPs during which the PRPs requested that the TWC draft a letter outlining the remedial actions necessary for the site. The February 20, 1985 TWC letter requested the following commitments from the PRPs: 1) implement soil cleanups for the ditches north and east of the site; 2) submit a soil boring plan for areas of the site identified by EPA as potential waste disposal sites; and 3) submit a ground water assessment plan for the site. The PRPs responded to the letter by requesting another meeting which was held on March 26, 1985. At the outcome of this meeting, TWC agreed to (1) limit immediate remedial actions to soil cleanups for the ditches and (2) postpone the other remedial actions until resolution of the law suit between the PRPs. A proposed Compliance Agreement dated May 28, 1985, an additional meeting held June 26, 1985 and another letter dated July 17, 1985 failed to achieve a formal commitment from the PRPs to jointly cleanup the ditches. As a result, the TWC asked the EPA to evaluate the site for an emergency action under Superfund. On October 15, 1985, a meeting was held between EPA, TWC and the PRPs during which it was announced that the Executive Director would seek a Commission Order to achieve the soil cleanup of the ditches. At the same meeting, EPA indicated that a complaint had been received which alleged that adverse health effects had been experienced in the locale of this site. EPA therefore requested that the PRPs undertake a health assessment survey of the area immediately. TWC representatives indicated that a health assessment survey would be part of the relief sought in the Executive Director's request for a Commission Order. TWC representatives also indicated that these possible adverse health effects could motivate the agency to seek a comprehensive cleanup of the site, even before the lawsuit among Eureka, Southern Pacific, and Olin is ultimately resolved.

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Fields Operations Division

RESIDENTIAL AREA



Map of Olin/S.P. Oliver site, Houston.